

REMARKS

In response to the Office Action mailed on September 17, 2008, Applicants respectfully request reconsideration. Claims 1-20, 24-27, 30-35, 38-40, and 43-52 are pending in this application. Claims 1-35, 37-40, and 42-44 are rejected. Claims 20-23, 28, 29, 36, 37, 41, 42 are canceled. Claims 2, 19, 27, and 43, are currently amended. Claims 45-52 are new. Based on amendments being submitted in this reply, claims 1, 18, 35, and 43 are independent claims, and the remaining claims are dependent claims. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

***Rejections under 35 U.S.C. §103***

Claims 1-13, 17-30, 34-37, and 43-44 have been rejected under 35 U.S.C. §103 as being unpatentable over Weber et al., Pub. No.: US 2006/0173992 ("Weber"), in view of Akagawa et al., Pub. No.: 2004/0210791 ("Akagawa"), and in further view of Cooper et al., Pub. No.: 2004/0042470, ("Cooper"). Claims 14-15, 31-32, and 44 have been rejected under 35 U.S.C. §103 as being unpatentable over Weber, Akagawa, and Cooper, and in further view of Manghimalani et al., Patent No.: 5,819,028 (Manghimalani). Claims 16 and 33 are rejected under 35 U.S.C. §103 as being unpatentable over Weber, Akagawa, and Cooper, and in further view of Beshai et al., Pub. No.: US 2004/0037558 ("Beshai"). Applicants traverse these rejections. Claims 20-23, 28, 29, 36, 37, 41, 42 have been canceled, and so the rejection of claims 20-23, 28, 29, 36, 37, 41, 42 is moot.

**Claim 1**

Claim 1 includes limitations not taught or suggested in the prior art references. In a previous reply, Applicants argued that Weber did not predate the instant application. The Office Action asserted that Weber claims priority to

three earlier-filed U.S. provisional applications that disclose events, status of events, severity values, severity rankings, and event category. Specifically, the Office Action cited U.S. Provisional App. No. 60/427,294 (filed Nov. 18, 2002) slides 7, 14, 19, 20, and 21.

Applicants respectfully submit that the Weber provisional applications do not disclose all of the limitations. Applicants searched the provisional applications and found disclosed “events” and “severity rankings.” Applicants, however, found that the Weber provisional applications were silent on “status of events”, “status,” “event category,” and even “category.”

Claim 1 recites: “receiving alert messages corresponding to status events in the storage area network, each status event having a corresponding event category and severity value.” In other words, such events are received already having an event category and a severity value. Applicants respectfully submit that Weber is silent on this limitation. Weber describes events and severity, but does not describe receiving alerts having corresponding event categories and severity values. Instead, Weber describes detecting low-level differences in network operation, and then analyzes those differences to detect anomalies.

Claim 1 recites: “aggregating the alert messages according to event category and severity value to generate a category specific severity ranking of the alert messages.” Applicants respectfully submit that without receiving alerts having corresponding event categories, Weber cannot describe aggregating alert messages according to event category to generate such rankings. Thus, the prior art reference does not provide this functionality.

Accordingly, Applicants respectfully submit that claim 1 is in condition for allowance. Applicants respectfully request the rejection under 35 U.S.C. §103 be removed.

**Claims 18 and 35.**

Applicants respectfully submit that claims 18 and 35 include patentable limitations as does claim 1. Claim 1 is a process claim. Claims 18 and 35 are product/manufacture claims having similar limitations to limitations in claim 1. For applicable reasons, Applicants respectfully submit that claims 18 and 35 are likewise patentable over the reference combination. Applicants respectfully request that the rejection under 35 U.S.C. §103 be removed.

**Claim 43.**

Claim 43 is an independent claim. Claim 43 recites “discovering a topology of nodes in the SAN, wherein the nodes comprise manageable entities, the manageable entities responsive to a server in the SAN and further including storage entities, connectivity entities, and database entities.” The Office Action cites Cooper figure 2 and 3 and [0161]. Cooper describes creating an initial policy from corporate network policy and a network topology diagram. In other words, Cooper uses an existing network topology diagram to create a policy. This is different from claim 43. Claim 43 claims **discovering a topology of nodes** in the SAN. If a network topology diagram already exists, then there is no need to discover a topology of nodes. Therefore, Applicants respectfully submit that Cooper fails to describe this limitation.

Claim 43 recites “propagating threshold values to remote agents, wherein responsive to the threshold values, the remote agents operable to analyze nodes and determine when a particular metric satisfying a triggering threshold is attained, and to generate a corresponding status event as an alert message.” The Office Action asserts that Weber in the Abstract discloses this limitation. While Weber describes collector devices, Weber does not explicitly or implicitly describe that these collector devices have the functionality to receive propagated threshold values to analyze the nodes based on the propagated threshold

values. Indeed, Weber describes the collector devices as merely collecting traffic data, and sending this data to an aggregator for subsequent analysis. Claim 43, however, claims that the remote agents analyze nodes based on thresholds before transmitting alerts and status events.

Accordingly, Applicants respectfully submit that claim 43 is in condition for allowance. Applicants respectfully request the rejection under 35 U.S.C. §103 be removed.

**Claims 2-17, 19-20, 24-27, 30-34, 38-40, and 44-52.**

By virtue of dependency, Applicants respectfully submit that all of the dependent claims are in condition for allowance as well. Note that the dependent claims recite further patentable distinctions over the cited prior art for consideration.

**Claim 2.**

Claim 2 recites: "wherein the alert messages are received from remote agents operating within a storage area network." That is, the remote agents are the entities that transmit alert messages. The data collectors of Weber transfer network traffic data to a separate server for subsequent analysis at the separate server to detect any anomalies.

**Claim 3.**

Claim 3 recites "wherein the enumeration is a histogram having a magnitude based on the severity scale and a quantity of events within each severity level within the severity ranking." This enumeration that is a histogram references enumeration of events from claim 2. The Office Action cites Weber figure 29. Weber figure 29 shows a list of events, and a graph of network traffic. This graph does not show events and severity ranking. Thus, Applicants

respectfully submit that the reference combination fails to describe the limitations of claim 3.

Claim 7.

Claim 7 recites: "each chart entry has a magnitude axis, the magnitude axis indicative of a relative range of the quantity of status events within each of the severity levels corresponding to a plurality of node entries reflected in the chart entry." The Office Action cites figure 29 of Weber. As explained above, the graph in figure 29 is merely a graph of network traffic over time. Applicants respectfully submit that this graph does not indicate a range of quantity of status event within each of the severity levels. The graph of Weber is not divided by severity levels. Thus, Weber fails to teach this limitation.

Claim 8.

Claim 8 recites: "each chart entry has a manageable entity axis, the manageable entity axis arranged, for each node, according to increasing severity scale denoting the severity ranking for each node included in the chart entry." As explained above, the graph of Weber just describes network traffic. Weber is silent on a manageable entity axis arranged according to increasing severity scale to denote a severity ranking.

Claim 16.

Claim 16 recites: "the status array is an N by M matrix of the plurality of chart entries, the plurality of chart entries including: i) a general alert chart entry displaying alert status of managed entities in the storage area network; ii) a storage chart entry indicating alert status of managed storage entities in the storage area network; iii) a host chart entry indicating alert status of managed

host entities in the storage area network; and iv) a connectivity chart entry indicating alert status of managed connectivity entities in the storage area network.” Applicants respectfully submit that the prior art does not teach this status array as an N by M matrix of a plurality of chart entries. The Office Action asserts that Beshai discloses arrays and matrices [0102] where state arrays and matrices are used for path allocation and scheduling. Claim 16 does not disclose or relate to path allocation and scheduling, and Beshai does not disclose using an N by M matrix for a status array of event severity. Furthermore, Applicants respectfully submit that Beshai was improperly cited because there is no motivation or suggestion to combine Beshai with Weber. For example, Weber relates to low-level event detection using heuristics, whereas Beshai discloses a modular switch, that is, a device to route network traffic.

Claim 44.

Claim 44 recites: “in response to a user request, the remote agents selectively suppressing events of a particular category and severity.” That is, the remote agents monitoring a SAN have the functionality to suppress event of a particular category and severity. As explained above, the data collectors of Weber do not have the functionality to suppress events by category and severity.

### ***Newly Added Claims***

Claims 27-45 are new and dependent directly or indirectly on independent claim 1. The newly added claims are supported by the specification. Support for claim 45 is found in the specification page 13, lines 8-10. Support for claim 46 is found in the specification page 13, lines 5-7. Support for claim 47 is found in the specification page 17, lines 28-31. Support for claim 48 is found in the specification page 17, lines 28-31. Support for claim 49 is found in the

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specification page 4, lines 4-8, page 6, lines 10-14, lines 29-31. Support for claim 50 is found in the specification page 5, lines 14-25, and page 6, lines 9-28. Support for claim 51 is found in the specification page 5, lines 14-25, and page 17, lines 17-31. Support for claim 52 is found in the specification page 14, lines 18-30, page 6, lines 11-17.

### ***Summary***

Applicant respectfully submits that the claims in the subject application are patentable over the reference combinations because the reference combinations fails to teach or disclose all of the features of the claimed invention. Thus, Applicants submit that the pending claims are in condition for allowance.

Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

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